

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

The Coleman Company, Inc.,)	
)	
<i>Plaintiff/Counterclaim Defendant,</i>)	
)	
v.)	Civil Action No: 2:20cv351-RGD-RJK
)	
Team Worldwide Corporation,)	
)	
<i>Defendant/Counterclaim Plaintiff</i>)	
)	
and)	
)	
Cheng-Chung Wang)	
)	
<i>Counterclaim Plaintiff</i>)	
_____)	

**TEAM WORLDWIDE CORPORATION’S MOTION TO SEAL ITS MEMORANDUM
IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGEMENT OF INVALIDITY OF
PLAINTIFF’S U.S. PATENT NO. 7,089,618 AND OF THE VALIDITY OF
DEFENDANT’S U.S. PATENT NO. 6,754,926**

Pursuant to Federal Rule of Civil Procedure 5.2, Local Rule 5(C) and Paragraph 8 of the Stipulated Protective Order entered in this case (ECF No. 25), Defendant/Counterclaim Plaintiff Team Worldwide Corporation and Counterclaim Plaintiff Cheng-Chung Wang (collectively, “TWW”), by counsel, respectfully move the Court for entry of the attached order permitting TWW to file under seal the unredacted Memorandum in Support of Its Motion for Summary Judgment of Invalidity of Plaintiff’s U.S. Patent 7,089,618 and of the Validity of Defendant’s U.S. Patent No. 6,754,926 and certain supporting exhibits. Paragraph 15 of the Protective Order states that: “Any DESIGNATED MATERIAL that is filed with the Court...shall be filed under seal and shall remain under seal until further order of the Court....” (ECF No. 55). In addition, TWW has

separately filed a Notice of Motion to Seal to provide the public with an opportunity to bring objections, if any, to sealing the documents that are the subject of this motion.

WHEREFORE, for the reasons set forth in the accompanying Memorandum in Support of the Motion to Seal, TWW respectfully requests that the Court grant the instant motion.

Dated: November 10, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing on November 10, 2021 with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all registered users.

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